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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

In re:	:	Chapter 11
LTL MANAGEMENT LLC,	:	Case No. 23-12825 (MBK)
Debtor.	:	

**NOTICE OF MOTION BY MOVANT ANTHONY HERNANDEZ VALADEZ FOR AN
ORDER (I) GRANTING RELIEF FROM THE AUTOMATIC STAY, SECOND
AMENDED EX PARTE TEMPORARY RESTRAINING ORDER, AND ANTICIPATED
PRELIMINARY INJUNCTION, AND (II) WAIVING THE FOURTEEN DAY STAY
UNDER FEDERAL RULE OF BANKRUPTCY PROCEDURE 4001(a)(3)**

PLEASE TAKE NOTICE that, on _____, 2023 at _____ .m., or as soon thereafter as counsel may be heard, the law firm of Kazan, McClain, Satterley & Greenwood, A

Professional Law Corporation (“Kazan Law”), and local counsel Saiber LLC, on behalf of their dying mesothelioma client and potential personal-injury claimant Anthony Hernandez Valadez (“Movant”), through his undersigned counsel, shall move before the Honorable Michael B. Kaplan, Chief Judge, at the United States Bankruptcy Court, Clarkson S. Fisher U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608, for the entry of an order pursuant to Section 362(d)(1) of the Bankruptcy Code, waiving the stay of Fed. R. Bankr. P. 4001(a)(3), granting Movant relief from the Automatic Stay, Second Amended Ex Parte Temporary Restraining Order (“TRO”) and anticipated Preliminary Injunction as to LTL Management LLC (“Debtor”), non-debtor Johnson & Johnson (“J&J”), , and retailers Albertsons Companies, Inc., Lucky Stores, Inc., Safeway Inc., Save Mart Supermarkets, Target Corporation, and Walmart Inc. (collectively, “Retailers”).¹

If this Court grants Movant’s requested relief and permits him to commence his asbestos personal-injury action in California state court, Movant intends to name the following entities as defendants (collectively, “Talc Defendants”): Debtor, Johnson & Johnson Consumer Inc. (“JJCI”), Johnson & Johnson (“J&J”), and non-debtor retailers Albertsons Companies, Inc., Lucky Stores, Inc., Safeway Inc., Save Mart Supermarkets, Target Corporation, and Walmart Inc. (collectively, “Non-Debtor Retailers”).

PLEASE TAKE FURTHER NOTICE that, in support of this motion, Movant will rely upon the declarations of Movant, Anna Camacho, Joseph Satterley, Dr. Leah Backhus, Dr. Dean Felsher, Dr. William Longo, Dr. Ronald Dodson, Dr. Mohana Roy, and Robert Johnson, exhibits attached thereto, the files and records of this case, as well as the memorandum of law submitted herewith pursuant to D.N.J. LBR 9013-1(a). A proposed form of order is submitted herewith.

¹ The last four digits of the Debtor’s taxpayer identification number are 6622. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

PLEASE TAKE FURTHER NOTICE that, pursuant to D.N.J. LBR 9013-2, responsive papers, if any, must be filed with the Clerk of the Bankruptcy Court, Clarkson S. Fisher Courthouse, 402 East State Street, Trenton, New Jersey 08608, and served upon (i) Kazan Law, (ii) Movant's counsel, (iii) Debtor's counsel, (iv) JJCI's counsel, (v) J&J's counsel, (vi) counsel for each of the Non-Debtor Retailers, and (vii) any other party entitled to notice no later than the deadline set forth in the order shortening time for hearing on this motion.

PLEASE TAKE FURTHER NOTICE that, unless an objection is timely filed and served, this motion will be deemed uncontested in accordance with D.N.J. LBR 9013-3(d) and the relief may be granted without a hearing.

Respectfully submitted:

KAZAN, McCLAIN, SATTERLEY &
GREENWOOD, A Professional Law Corporation

- and -

SAIBER LLC
Counsel for Movant Anthony Hernandez Valadez

By: /s/ John M. August
JOHN M. AUGUST

DATED: April 10, 2023